





**From:** Shauna Holman-Harries  
**To:** Atkins, Hea Jung K - OFCCP  
**Cc:** Luong, Hoan - OFCCP; Neil Bourque; Charles Nyakundi; Bill Couch; Lida Daniel; Vickie Thrasher  
**Subject:** April 27 RFI Item 3  
**Date:** Tuesday, June 02, 2015 10:27:47 AM

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Hello Hea Jung. I am sending this email in response to your request #3 in your April 27 letter regarding internal pay equity analysis during. To answer your question, I refer you to the lengthy interview conducted with Lisa Gordon by Brian Mikel over two days on January 9 and 13, 2015. Mr. Mikel was also provided with an explanation of pay and the pay review process on January 9. In sum, pay equity at Oracle, and ensuring fairness and consistency among or between cohorts, is an-going process, and an integral part of Oracle's evaluation of its compensation systems.

During her interview with Mr. Mikel, Ms Gordon was asked extensively what Oracle has in place to assess employee pay and to ensure fairness and consistency relative to its jobs and the legitimate, non-discriminatory factors used by Oracle. In sum, she noted the role of HR or Compensation, and/or a manager, in reviewing where a new hire's pay falls relative to incumbent cohorts. She also referred to the Company's compensation policies and training materials we previously provided to OFCCP. She also identified the process of focal reviews as another tool to assess relative pay. She also identified the role played by Carolyn Balkenol and her team in essentially providing a further point of process quality control.

As you will also recall, Ms Balkenol was interviewed during the on-site. Although the OFCCP never provided any notes of her interview, which took place Thursday, March 26, Neil Bourque was present. As Ms Balkenol explained during this interview, she does not conduct any substantive review of pay decisions. Rather she does "quality control" of the hiring paperwork and process. She also was asked whether, at her level, the conversation is on raising or lowering salary. She said "no" and that in any such instance she would send it to "Compensation."

With regard to pay audits to assess legal compliance with Oracle's non-discrimination obligations and to further ensure Oracle's compensation policies and practices are carried out, those are conducted by our outside EEO compliance counsel at Orrick.

Best Regards,  
Shauna Holman-Harries

ORACLE

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**U.S. Department of Labor**

Office of Federal Contract Compliance Programs  
Greater San Francisco/Bay District Office  
907<sup>th</sup> Street, Suite 11-100  
San Francisco, California 94103



**VIA EMAIL**

April 27, 2015

Shauna Holman-Harries  
Director Diversity Compliance  
Oracle America, Inc.

Dear Ms. Holman-Harries:

Thank you for your cooperation and assistance during our March 24 – 27 onsite. It is our desire to complete this compliance evaluation in an efficient and effective manner. In order to complete the on-site phase of the compliance evaluation, we will need to conduct a follow-up onsite to interview select first level managers, college recruiter(s), and Oracle's in house counsel Juana Schurman in her capacity as Vice President and Associate General Counsel. We would also like to conduct a brief follow-up interview with Lisa Gordon. Please advise whether you have availability for approximately three to four days from May 4 to May 7 for a follow-up onsite. If the week of May 4 does not work, please let me know if the week of May 18 or May 26 are feasible. A list of the interviewee names will be sent shortly.

In addition, please provide the following information, some of which have already been requested, by May 8, 2015:

1. A screenshot of a software developer employee's page on each of Oracle's internal websites: (1) Compensation Workbench (CWB) and (2) Information Workbench (IWB). From the CWB, please also provide a screenshot of the page used by a manager when making a starting salary recommendation for a new hire and a wage increase recommendation for an Oracle employee. (originally requested on February 10, 2015)
2. Employee personnel actions containing job and salary information and history for all employees and student interns. This information should include, but not be limited to, starting wages, wage increases, bonus awards, job title hired into, starting stock level, job title and supervisor changes, stock level changes, promotion history, performance evaluations, ranking information, etc. with dates associated for each action. (the salary history was originally requested February 10, 2015)
3. Dates of any internal pay equity analysis conducted during the past three years, as required under 60-2.17. For each analysis, include:

- Dataset used for that analysis
  - Actions taken, if any, as a result of the analysis
4. HQCA March 2015 submission of number of protected Veterans included only 19 individuals. VETS 100-A report stated a total of 137 veterans. Please provide a detailed explanation of this discrepancy.
  5. Please provide a detailed explanation of why the total workforce in the AAP only had 7,421 employees but the 2014 EEO-1 report showed 16,015 employees.
  6. For all employees who were hired during the review period 01/01/2013 – 06/30/2014, include the following in separate columns:
    - Visa status (yes/no)
    - If they are on visa status, include the specific visa (not limited to H1B) they were holding
  7. Please resubmit the compensation database (snapshot as of 01/01/2014) to include each of the following, some of which have already been requested, in separate columns:
    - Starting wages/salary
    - School attended
    - Educational degree
    - Prior salary immediately before joining Oracle
    - Performance evaluation rating
    - Rank (by performance)
    - Hire date/Acquisition date
    - Hourly wages
    - Number of hours worked
    - Years of experience before joining Oracle
    - Stock level
    - Hiring manager(s)
    - Amount of signing bonus
    - Visa status
    - Type of visa, including but not limited to H1B
    - The date (mm/dd/yyyy) that the visa was initially processed
    - Current status of visa
    - The date (mm/dd/yyyy) that green card/permanent resident card was processed
  8. Please resubmit the Resume Files that were sent on Thursday, March 26, 2015, in an easy to read format. The picture-format resumes pasted on MS Word could not be easily read.
  9. For all applicants and total hires in the following job titles from January 1, 2013 to June 30, 2014, please provide the following:
    - Copies of each requisition, including copies of each job posting and each job description

- Copies of all applications, resumes and any and all supplemental information submitted by each applicant
- Name and job title of the hiring manager(s) for each requisition
- Date of hire for each requisition
- Name and job title of individual hired for each requisition

Job Titles:

Software Developer 1 (77 applicants; 11 hires)  
 Software Developer 2 (1328 applicants; 167 hires)  
 Software Developer 3 (799 applicants; 87 hires)  
 Software Developer 4 (874 applicants; 104 hires)  
 Software Developer 5 (367 applicants; 56 hires)  
 Student Interns (or Job Group C1) (1022 applications; 85 hires)

10) For all promotions in the following job titles from January 1, 2013 to June 30, 2014, please provide the following:

- Copies of relevant documentation related to the promotion, including but not limited to, job posting, job description and any and all information submitted by each applicant for promotion
- For each promotion, name, race, gender, date of promotion, job title promoted from, job title promoted into, type of promotion (competitive or non-competitive), change in salary, change in stock level
- Description of Oracle's promotion process

Job Titles:

Telesales Business Development Manager  
 Telesales/Internet Sales Manager  
 Marketing Comm/PR Specialist 4

11) Supporting documentation of employee terminations for the following job titles from January 1, 2013 to June 30, 2014:

- Software Developer – Architect (63 total; 3 terminations)
- Senior Internet Sales Consultant (47 total; 4 terminations)
- Associate Internet Sales Representative (56 total; 7 terminations)
- Principal Sales Consultant (35 total; 5 terminations)
- Internet Sales Representative II (155 total; 3 terminations)

Finally, please confirm that Oracle has provided complete and accurate information for all of its data submissions to the OFCCP to date, including all relevant compensation information and factors affecting pay as submitted by Oracle. In order to facilitate the most efficient and effective review, we request that Oracle affirmatively state in a written response that all information submitted to date is complete and accurate.



For the follow-up onsite, we request that you provide 2 interview rooms so that we may conduct 2 simultaneous interviews while onsite. We anticipate that each interview may take up to 2 hours. We will work together over the coming days to develop an interview schedule.

Additional data and/or information may be identified and requested prior to and during the on-site evaluation. If you have any questions, please contact me at (415) 625-7829.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hea Jung Atkins', written over a horizontal line.

Hea Jung Atkins  
District Director